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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS RAMON CAMPOS,

Defendant.

CASE NO. 2:22-CR-00010-WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: February 21, 2023
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on February 21, 2023.
2. By this stipulation, defendant now moves to continue the status conference until March 20, 2023 at 9:00 a.m., and to exclude time between February 21, 2023, and March 20, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes Spanish audio recordings, reports, and photographs. This discovery has been either produced directly to counsel and/or made available for inspection and copying.

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2 b) Counsel for defendant needs additional time to review the discovery, meet with
3 her client to discuss the discovery and the evidence impacts resolution and sentencing options,
4 conduct independent factual investigation, and otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny him/her the reasonable time necessary for effective preparation, taking
7 into account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of February 21, 2023 to March 20,
14 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendant's request on the basis
16 of the Court's finding that the ends of justice served by taking such action outweigh the best
17 interest of the public and the defendant in a speedy trial.

18 **[continued on next page]**

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 15, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ CAMERON L. DESMOND
CAMERON L. DESMOND
Assistant United States Attorney


Dated: February 15, 2023

/s/ Megan McLoughlin
Megan McLoughlin
Counsel for Defendant
Jesus Ramon Campos

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED.

Dated: February 16, 2023


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE